

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

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|---|---|------------------------------------|
| <b>KENNETH D. BELL, in his capacity<br/>as court-appointed Receiver for Rex<br/>Venture Group, LLC d/b/a<br/>ZeekRewards.com,</b> | ) |                                    |
|   | ) | <b>Plaintiff,</b>                  |
|   | ) |                                    |
|   | ) | <b>Civil Action No. 3:15-cv-70</b> |
| <b>vs.</b>  | ) |                                    |
|   | ) |                                    |
| <b>HAMISH BROWNIE,<br/>PRAVEEN KUMAR, and<br/>DAVID IAN MACGREGOR<br/>FRASER,</b>   | ) |                                    |
|   | ) | <b>Defendants.</b>                 |
|   | ) |                                    |
|   | ) |                                    |

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**MOTION FOR EXTENSION OF TIME TO RESPOND**

The Receiver, through undersigned counsel, requests an extension of time to file a response to Defendant Fraser's Motion to Dismiss. In support of the Motion, the Receiver shows unto the Court as follows:

1. Defendant Fraser received an extension to answer the lawsuit and filed a Motion to Dismiss on May 8, 2015;
2. A Response to the Motion to Dismiss is currently due on May 26, 2015;
3. The time for filing a responsive brief has not yet expired, and the Receiver's counsel requires additional time to respond to the Motion; and
4. Counsel for Defendant Fraser has indicated consent to a reasonable extension of time for the Receiver to file a response.

Therefore, the undersigned counsel for the Receiver, with the consent of counsel for Defendant Fraser, respectfully moves the Court for an extension of time to and including June 10, 2015 to file a responsive brief.

Dated: May 19, 2015

Respectfully submitted,

/s/ Matthew E. Orso  
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*Attorneys for the Receiver*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will provide service of this motion to counsel of record for Defendant Fraser.

Dated: May 19, 2015

/s/ Matthew E. Orso